

REMARKS


Claim 13 was rejected under § 102(a) based on Mandelman. Claim 13 *inter alia* calls for an interconnection layer positioned over such substrate. The Office Action suggests that the interconnection layer is the items 11 or 15. However, the items 11 or 15 are dielectric layers. See column 6, line 27. Therefore these layers plainly cannot be interconnection layers.

Claim 24 calls for a guard ring encircling an active element. The Office Action suggests that the guard ring is the item 30 or 31. The item 30 is a void. See column 8, line 35. The item 31 is an oxide layer. See column 8, line 60. Therefore, neither a void nor an oxide layer can constitute a guard ring. For example, the Illustrated Dictionary of Electronics describes a guard ring as a metal ring (or other configuration) surrounding, but separate from a charged body or terminal, for the purpose of evenly distributing the electric charge over the latter's surface.

In view of these remarks, the application is now in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested.

Respectfully submitted,

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